



Matthew Rodriguez
Secretary for
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California Regional Water Quality Control Board Lahontan Region

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Edmund G. Brown Jr.
Governor

December 7, 2011

Robert C. Doss
Pacific Gas and Electric Company
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AMENDED CLEANUP AND ABATEMENT ORDER NO. R6V-2011-0005A1 – RESPONSE TO NOVEMBER 23, 2011 LETTER – PARAGRAPH 3.a. OF ORDER

I am in receipt of your November 23, 2011 letter providing Pacific Gas and Electric's (PG&E) response to the requirement in Paragraph 3.a. of the subject Order. Based on the information submitted I cannot either accept or reject PG&E's proposal to use the current background level for hexavalent chromium of 3.1 ppb as the only trigger that would require PG&E to provide replacement water.

In your letter you indicate that you have found no technically sound and implementable methodologies for determining impacts to domestic wells below background levels as required by Ordering Paragraph 3.a. Therefore, PG&E states that it is appropriate to use one of the listed statistical methods in 23 California Code of Regulations (CCR) section 2550.7(e) that provides for the use of an upper tolerance limit (UTL). However, the subject Order specifically directed PG&E to evaluate and propose a statistical method that could detect changes in an individual well that were attributable to the PG&E release of hexavalent chromium when detectable levels of hexavalent chromium are below the background level which was based on an UTL.

You indicate that your petition to the State Water Resources Control Board included the rational for why developing a methodology is not feasible. Furthermore, you summarize your consultant's views on this issue. However, your letter does not include any specific information on what statistical methods were evaluated and the specific reasons why each was rejected. Without this information, I am not able to fully evaluate your proposal.

I request that PG&E submit the details of its evaluation of all statistical methods considered and the specific reasons why these methods were rejected by December 22, 2011.

Harold J. Singer
Executive Officer

c. Lauri Kemper, Assistant Executive Officer, Lahontan Water Board